

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

BARRY ZIPPER,)	
)	
Plaintiff,)	C.A. NO. 06-444-KAJ
)	
v.)	JURY TRIAL DEMANDED
)	
STEPHEN LANGE, and)	
JOSEPH LANGE,)	
)	
Defendants.)	

ANSWER TO COMPLAINT

1. Admitted upon information and belief.
2. Admitted.
3. Admitted.
4. Defendants are without sufficient information to answer to the allegation that plaintiff was completely stopped at the intersection waiting to make a left turn. The remaining allegations are admitted.
5. Denied.
6. Defendants are without sufficient information to answer these allegations.
7. Defendants are without sufficient information to answer these allegations.
8. Defendants are without sufficient information to answer these allegations.
9. Defendants are without sufficient information to answer these allegations.
10. Defendants are without sufficient information to answer these allegations.
11. Defendants are without sufficient information to answer these allegations.

COUNT I

12. Defendants incorporate by reference paragraphs 1 through 11 of this Answer.

13. Denied.
14. Defendants deny negligence and are without sufficient information to answer the remaining allegations.

WHEREFORE, defendants demand judgment in their favor plus court costs.

COUNT II

15. Defendants incorporate by reference paragraphs 1 through 14 of this Answer.
16. Denied.
17. Denied.

WHEREFORE, defendants demand judgment in their favor plus court costs.

MICHAEL A. PEDICONE, P.A.

By: /s/ Michael A. Pedicone
Michael A. Pedicone, Esquire (No. 2424)
109 W. 7th Street
P.O. Box 1395
Wilmington, DE 19899
(302) 652-7850
Attorney for Defendants

Dated: September 19, 2006

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)	
Defendants.)	

CERTIFICATE OF SERVICE

I hereby certify that I have caused copies of the foregoing Answer to Complaint to be served via e-file and US mail on September 19, 2006, upon:

Nicholas J. Renzi, Esquire
500 Cottman Avenue
Cheltenham, PA 19012
Attorney for Plaintiff
(215) 663-0400

MICHAEL A. PEDICONE, P.A.

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